

Cumberland Council

FAO: Christie Burns

By email only

Date: 18th November 2025

**Town & Country Planning (Development Management Procedure) (England)
Order 2015**

Application Reference: 4/25/2344/0F1

Site: Millom School, Salthouse Road, LA18 5AB

Proposal: Proposed new access road from Salthouse Road to the facility

Sport England Reference: PA/25/NW/CU/72109

Thank you for consulting Sport England on the above application.

Sport England – statutory consultee role and policy

We understand that you have consulted us as a statutory consultee in line with the above Order. Therefore, we have considered the application in light of the National Planning Policy Framework (NPPF), in particular paragraph 104, and Sport England's Playing Fields Policy, which is presented within our 'Playing Fields Policy and Guidance Document': www.sportengland.org/playingfieldspolicy

Sport England's policy is to oppose the granting of planning permission for any development which would lead to the loss of, or prejudice the use of:

- all or any part of a playing field, or
- land which has been used as a playing field land remains undeveloped, or
- land allocated for use as a playing field

unless, in the judgement of Sport England the development as a whole meets with one or more of five specific exceptions. The exceptions are provided in the Annex to this response.

The proposal and impact on playing field

Proposed access road that encroaches onto playing field land that includes a number of sports pitches and other outdoor sports such as athletics. The playing field also includes a recently constructed active track and sports lighting.

Assessment against Sport England's Playing Fields Policy and NPPF

Playing field policy is a restrictive policy based on a presumption against any development which results in the loss of playing field (in whole or part) or prejudices its use. As such, for development not to encounter an objection from Sport England it must be shown to be of a form covered by one of the exceptions (to the presumption against) set out in the Annex below.

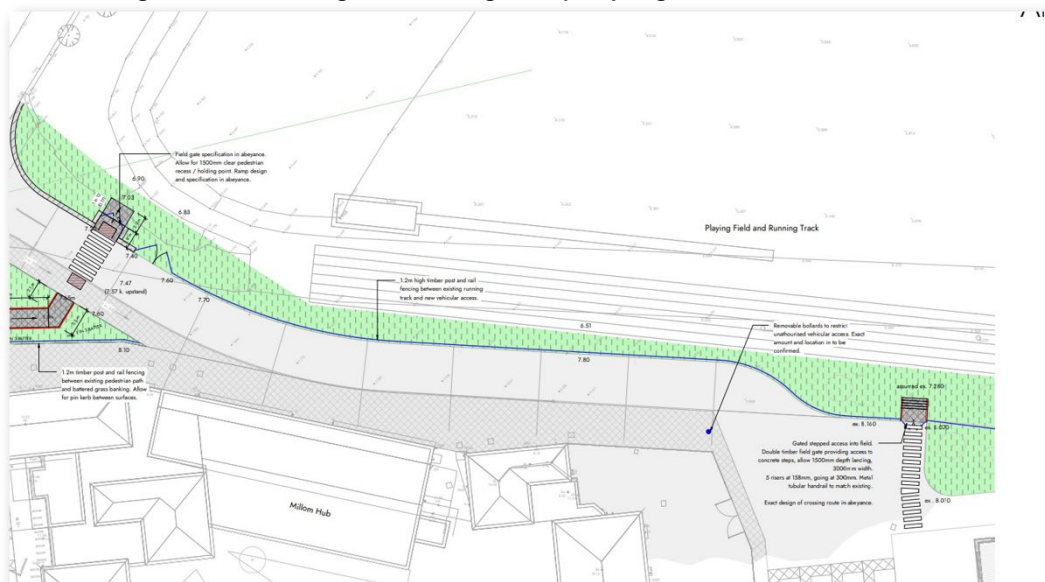
As part of the assessment of this consultation, Sport England has sought the views of the relevant National Governing Body of Sport who act as Sport England's technical advisors in respect of their sport and their sport facilities.

No objections were raised from the England and Wales Cricket Board, the Rugby Football League, the Football Foundation, England Netball and Volleyball England who all consider that the development proposal to not have an adverse impact on their sport. However, concerns have been raised by England Athletics, as summarised below:

England Athletics seeks confirmation that the proposal will not prevent use of the track (including lighting) during construction and that the timber post rail will be minimum 1m from the outer edge of the Active Track and that the two access points will not impact on the track usage and lighting columns (shown below).



2025 Google Aerial Image showing the playing field with active track



Proposed Site Plan showing encroachment that may impact an active track

The following assessment has been made in relation to our policy exceptions:

Exception 1 – No information has been provided that demonstrate there is an excess of playing field provision in the locality, which will remain the case should the development be permitted.

Exception 2 – The proposal is not an ancillary facility supporting the principal use of the site as a playing field.

Exception 3 – Given, the above comments from England Athletics, it is considered that there is insufficient information for Sport England to consider that the development proposal would not have an adverse impact on the playing field for athletics.

Exception 4 – No equivalent replacement playing field is proposed.

Exception 5 – The proposal is not for an indoor or outdoor sports facility.

Therefore, the proposal does not meet any of our policy exceptions.

Sport England's position

Given the above, Sport England raises a **statutory objection** to the application because it is not considered to accord with any of the exceptions to our Playing Fields Policy or paragraph 104 of the NPPF.

Potential to overcome the statutory objection

Sport England would be pleased to review the objection with a view to considering potentially withdrawing it if the applicant can provide the following:

- Site plans at an appropriate scale that addresses England Athletics comments. They should clearly show how the development proposal would not have an adverse impact on the active track and its safety run off area, including its sports lighting.
- Reassurance and clarification as to the proposed measures to ensure the continued use of the playing field during construction works.
- Given the proposed encroachment onto the playing field, clarification is sought as to whether the applicant is willing to enter into a community use agreement to secure the benefits to community sport, if one is not in place already.

Should the applicant require any technical advice in respect of the proposed relationship between the development proposal and the active track they should directly contact Ed Hunt from England Athletics (Email: ehunt@englandathletics.org). The applicant is advised that England Athletics can only provide technical advice in relation to athletics. They cannot provide a planning judgment as that is a matter reserved for Sport England as the consultee.

Determining the application

If this application is to be presented to a Planning Committee, we would like to be notified in advance of the publication of any committee agendas, report(s) and committee date(s).

Sport England would be pleased to comment on further details that address the above comments. However, so that there is a formal audit trail and so that workload commitments can be effectively managed, Sport England would kindly request that any additional information is submitted to Planning.North@sportengland.org and not the Planning Manager directly.

Yours sincerely,

A handwritten signature in black ink that reads "C. Carroll". The script is fluid and cursive, with the first name "C." and the last name "Carroll" clearly distinguishable.

Christopher Carroll

Planning Manager

Annex

The Five Exceptions to Sport England's Playing Fields Policy

Exception 1

A robust and up-to-date assessment has demonstrated, to the satisfaction of Sport England, that there is an excess of playing field provision in the catchment, which will remain the case should the development be permitted, and the site has no special significance to the interests of sport.

Exception 2

The proposed development is for ancillary facilities supporting the principal use of the site as a playing field, and does not affect the quantity or quality of playing pitches or otherwise adversely affect their use.

Exception 3

The proposed development affects only land incapable of forming part of a playing pitch and does not:

- reduce the size of any playing pitch;
 - result in the inability to use any playing pitch (including the maintenance of adequate safety margins and run-off areas);
 - reduce the sporting capacity of the playing field to accommodate playing pitches or the capability to rotate or reposition playing pitches to maintain their quality;
 - result in the loss of other sporting provision or ancillary facilities on the site;
- or
- prejudice the use of any remaining areas of playing field on the site.

Exception 4

The area of playing field to be lost as a result of the proposed development will be replaced, prior to the commencement of development, by a new area of playing field:

- of equivalent or better quality, and
- of equivalent or greater quantity, and
- in a suitable location, and
- subject to equivalent or better accessibility and management arrangements.

Exception 5

The proposed development is for an indoor or outdoor facility for sport, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss, or prejudice to the use, of the area of playing field.

The full 'Playing Fields Policy and Guidance Document' is available to view at:
www.sportengland.org/playingfieldspolicy